

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ESTATE OF FRANK B. LYNOTT, by and
through BRUCE R. MOEN, personal
representative;

Plaintiff,

v.

LAURIE A. LUCKOVICH, individually; et al.;

Defendants.

No. 2:14-cv-00503-RSL

**STIPULATED MOTION SETTING
NEW TRIAL DATE AND
AMENDING CERTAIN CASE
DEADLINES**

The parties hereto, by and through their attorneys of record, recognize and acknowledge that the stay in this case has expired and that a new trial date must be assigned and certain case deadlines reset as a result of defendants' retention of new counsel. Those proposed deadlines are listed below, pending approval of the Court.

The Parties agree that the Order Setting Trial Date and Other Related Dates issued March 7, 2016 should be amended to extend all case schedule deadlines to reflect a new trial date of April 2, 2018 or the Court's earliest available date thereafter. The parties agree that only certain case deadlines should be amended, as follows:

**STIPULATED MOTION SETTING NEW
TRIAL DATE AND AMENDING CERTAIN
CASE DEADLINES**

2:14-cv-00503-RSL

Case Event	Date
TRIAL DATE - Length of jury trial: 8-10 Days	April 2, 2018
Reports from Expert Witnesses Due	September 4, 2017
Reports from Rebuttal Expert Witnesses Due	October 23, 2017
All motions related to discovery must be <u>noted</u> on the motion calendar no later than the Friday before discovery closes pursuant to LCR 7(d) or LCR 37(a)(2)	November 30, 2017
Discovery Completed By	December 4, 2017
Settlement Conference held no later than	December 18, 2017
All dispositive motions must be filed by the stated date and noted on the motion calendar no later than the fourth Friday thereafter (see LCR 7(d)(3))	January 4, 2018
All motions in limine must be filed by and noted on the motion calendar no earlier than the <u>second</u> Friday thereafter. Replies will be accepted.	March 5, 2018
Agreed Pretrial Order Due	March 19, 2018
Pretrial Conference to be scheduled by the court	
Trial briefs, proposed voir dire questions, proposed jury instructions, and trial exhibits due	March 26, 2018

STIPULATED and AGREED this 17th day of April, 2017.

ROBERT J. WAYNE, P.S.

LAW OFFICES OF WILLIAM A. KINSEL, PLLC

By: /s/ Robert J. Wayne

Robert J. Wayne, WSBA No. 6131
Attorney for Defendants Laurie Luckovich
& Investors Choice Real Estate
200 1st Avenue W, Suite 550
Seattle, WA 98119
bwayne@trialsnw.com

By: /s/ William A. Kinsel

William A. Kinsel, WSBA No. 18077
Attorney for Plaintiff
2401 4th Ave., Suite 850
Seattle, WA 98121
wak@kinsellaw.com

LAW OFFICE OF ROBERT B. GOULD

By: /s/ Robert B. Gould

Robert B. Gould, WSBA No. 4353
Attorney for Defendants Campbell &
Reiche
51 W. Dayton Street, Ste. 208
Edmonds, WA 98020
RBGould@nwlegalmal.com

STIPULATED MOTION SETTING NEW
TRIAL DATE AND AMENDING CERTAIN
CASE DEADLINES

LAW OFFICES OF
WILLIAM A. KINSEL, PLLC
FOURTH & BATTERY BUILDING
2401 4th Avenue, Suite 850
SEATTLE, WASHINGTON 98121
(206) 706-8148

I. ORDER

Based upon the foregoing stipulation it is ordered that the Order Setting Trial Date and Other Related Dates issued in this proceedings on March 7, 2016 are amended and the Courtroom Deputy is hereby instructed to issue an amended Order Setting Trial Date and Other Related dates setting a new trial date for April 2, 2018, or the Court's earliest available date thereafter and extending all case schedule deadlines consistent with that trial date and the foregoing stipulation.

Entered this 19th day of April, 2017.



JUDGE ROBERT S. LASNIK

Jointly Presented By:

ROBERT J. WAYNE, P.S.

LAW OFFICES OF WILLIAM A.
KINSEL, PLLC

By: /s/ Robert J. Wayne

Robert J. Wayne, WSBA No. 6131
Attorney for Defendants Laurie Luckovich
& Investors Choice Real Estate
200 1st Avenue W, Suite 550
Seattle, WA 98119
bwayne@trialsnw.com

By: /s/ William A. Kinsel

William A. Kinsel, WSBA No. 18077
Attorney for Plaintiff
2401 4th Ave., Suite 850
Seattle, WA 98121
wak@kinsellaw.com

LAW OFFICE OF ROBERT B. GOULD

By: /s/ Robert B. Gould

Robert B. Gould, WSBA No. 4353
Attorney for Defendants Campbell &
Reiche
51 W. Dayton Street, Ste. 208
Edmonds, WA 98020
RBGould@nwlegalmal.com

STIPULATED MOTION SETTING NEW
TRIAL DATE AND AMENDING CERTAIN
CASE DEADLINES

2:14-cv-00503-RSL

LAW OFFICES OF
WILLIAM A. KINSEL, PLLC
FOURTH & BATTERY BUILDING
2401 4th Avenue, Suite 850
SEATTLE, WASHINGTON 98121
(206) 706-8148